

# ArrayComm

2300 N Street, NW, Suite 700, Washington, DC 20037  
(202) 383-3355 (202) 721-9818 - fax

April 26, 2002

Thomas Sugrue, Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: WT Docket No. 02-08, *Reallocation of the 216-220 MHz, 1390-1395 MHz, 1429-1432 MHz, 1432-1435 MHz, 1670-1675 MHz, and 2385-2390 MHz Government Transfer Bands*

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Dear Mr. Sugrue:

This letter addresses the sole remaining “technical” issue in the 1670-1675 MHz portion of the above docket. As such, it supplements the initial and reply comments that ArrayComm has filed in this proceeding.

The issue is clear-cut: What protection should be afforded to radioastronomy operations in the adjacent band below 1670-1675 MHz and radiosonde operations in the adjacent band above 1670-1675 MHz (All questions about co-channel protection seem to have been resolved to the satisfaction of all parties).<sup>1</sup>

ArrayComm’s position has been that we are willing to afford protection, provided the adjacent channel stations are identified and the degree of protection is established.

ArrayComm’s position is grounded in reality. It is important at the outset, certainly before an auction, to have a clear view of what limitations, if any, will be placed on a 1670-1675 MHz licensee. It is far better to know what might occur than to be surprised at some future date after our system, for example, has been installed.

To that end, ArrayComm expended considerable time and effort with NTIA and the affected US Government agencies, as well as OET and your Bureau, to arrive at an agreement as to what the responsibilities of a 1670-1675 MHz licensee would be.

The measure of protection that NTIA wants, ArrayComm is willing to provide.<sup>2</sup> At our last meeting with NTIA, we understood that it had agreed to furnish the Commission with a list

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<sup>1</sup> Actually, the “issue” of protection may be even narrower. The Commission has indicated a willingness to specify the adjacent channel radioastronomy systems that must be afforded protection from 1670-1675 MHz licensees and list them in its rules as has been done for satellite operations. See Section 25.213 and Section 2.106, footnote US311. Thus, only radiosonde protection is unresolved.

<sup>2</sup> ArrayComm has proposed regulatory language for the protection of radiosondes in its Reply Comments in ET Docket 00-221, filed April 6, 2001, Appendix I at XX.19. It has also provided a list of NWS radiosonde sites in its Comments in ET Docket 00-221, filed March 8, 2001, at Appendix D. Alternatively, the list of NWS radiosonde sites can be found on the Worldwide Web at <http://www.ua.nws.noaa.gov/stations.htm>.

of radiosonde stations to be protected. This list could/would then be incorporated into the Commission's Rules as was done for satellite operations.


However, when we met with representatives of WTB, reservations were expressed about this approach. It was contended that the Order transferring this spectrum from the USG to the FCC did not indicate that any protection needed to be afforded to adjacent channel radiosonde systems by FCC licensees. There was further concern that to provide for such protection in the Commission's rules could create a precedent that might impact adversely on the FCC in future years.

Both radioastronomy and radiosondes are uniquely sensitive government services. We believe they are valuable as well to the betterment and security of the United States. We believe they should be protected. Of importance, here, however, we believe the Commission has an obligation to protect its licensee, the prospective winner of the 1670-1675 MHz auction. To leave this matter at a state where, at any time in the future, your licensee could be a pawn in a controversy over whether one of its systems has to be dismantled or substantially modified because it was interfering with a radiosonde system would contravene logic and sound public policy.

ArrayComm urges the Commission to adopt a protection process that gives certainty to your licensee at the outset and provides appropriate protection to vital Government services.

Respectfully submitted,

**ArrayComm, Inc.**



Bradley P. Holmes  
Senior Vice President, Regulatory and  
Government Affairs

cc: Chairman Michael Powell  
Commissioner Kathleen Abernathy  
Commissioner Michael Copps  
Commissioner Kevin Martin  
Peter Tenhula  
Bryan Tramont  
Paul Margie  
Samuel Feder  
Thomas Sugrue  
Edmund Thomas  
Paul Kolodzy  
Julius Knapp  
Bruce Franca  
Lisa Gaisford  
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Kathleen Ham  
Margie Wiener  
Zenji Nakazawa  
Nese Guendelsberger  
Brian Marengo  
Kelly Quinn  
Tim Maguire